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15 *Attorneys for Plaintiff*

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE DISTRICT OF NEVADA**

18 CENTER FOR BIOLOGICAL DIVERSITY,

19 Plaintiff,

20 v.

21 DEBRA HAALAND, et al.,

22 Defendants,

23 and

24 LEE CANYON SKI LIFTS, INC.,

25 [Proposed] Defendant-  
26 Intervenor.

Case No. 2:20-cv-02131-RFB-DJA

**FIRST STIPULATION AND**  
**[PROPOSED] ORDER FOR**  
**EXTENSION OF THE BRIEFING**  
**SCHEDULE**

27 Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1, Plaintiff CENTER FOR BIOLOGICAL  
28 DIVERSITY, by and through its attorneys, and Federal Defendants DEBRA HAALAND, in her  
official capacity as Secretary of the U.S. Department of the Interior, MARTHA WILLIAMS, in

1 her official capacity as Principal Deputy Director of the U.S. Fish and Wildlife Service, GLEN  
2 KNOWLES, in his official capacity as Field Supervisor of the Southern Nevada Fish and  
3 Wildlife Office; U.S. FISH AND WILDLIFE SERVICE; WILLIAM DUNKELBERGER, in his  
4 official capacity as Humboldt-Toiyabe National Forest Supervisor; and U.S. FOREST SERVICE  
5 (collectively “Federal Defendants”), by and through their attorneys, hereby stipulate to an  
6 extension of the briefing schedule. Plaintiff’s motion for summary judgment is currently due on  
7 June 25, 2021.<sup>1</sup> See ECF 26, ¶ 4. This is the first stipulation for an extension of time for the  
8 briefing schedule.  
9

10 The parties propose the following briefing schedule in place of the current one:

- 11 1. Deadline for Plaintiff to file its motion for summary judgment, which will be limited to  
12 45 pages: July 23, 2021
- 13 2. Deadline for Federal Defendants to file their response to Plaintiff’s motion, and any  
14 cross-motion for summary judgment, which brief will be limited to 40 pages: August 20,  
15 2021
- 16 3. Deadline for [proposed] Defendant-Intervenor to file its response to Plaintiff’s motion,  
17 any cross-motion for summary judgment, which brief will be limited to 30 pages:  
18 September 10, 2021
- 19 4. Deadline for Plaintiff to file its combined response and reply, which brief will be limited  
20 to 40 pages: October 8, 2021
- 21 5. Deadline for Federal Defendants to file any reply, which brief will be limited to 25 pages:  
22 November 5, 2021

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28 <sup>1</sup> Although this Court has not yet ruled on proposed Defendant-Intervenors’ motion to intervene  
as of the filing of this stipulation, the parties’ attorneys conferred with Defendant-Intervenors’  
counsel and they had no objection to this proposed schedule.

1 6. Deadline for [proposed] Defendant Intervenor to file any reply, which brief will be  
2 limited to 20 pages: November 19, 2021.

3 This stipulation is warranted given the complexity of the issues that will be addressed in  
4 the motion for summary judgment, upcoming travel necessary for the pursuit of a potential  
5 settlement of this matter, previously planned travel of one of Plaintiff's attorneys to attend a  
6 wedding, and due to the Fourth of July holiday.  
7

8  
9 Dated: June 15, 2021

Respectfully submitted,

10 *s/ Ryan Adair Shannon*

11 Ryan Adair Shannon

*Pro Hac Vice*

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*Attorneys for Federal Defendants*

**IT IS SO ORDERED.**

DATED: June 15, 2021.

  

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**RICHARD E. BOULWARE, II**  
**United States District Court**

**CERTIFICATE OF SERVICE**

I hereby certify that today I electronically filed the foregoing **FIRST STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF THE BRIEFING SCHEDULE** with the Clerk of the Court using the CM/ECF system, which will send notification of such upon all attorneys of record.

Dated: June 15, 2021

/s/ Ryan Adair Shannon  
Ryan Adair Shannon